



Federal Communications Commission
Washington, D.C. 20554

June 28, 2023

DA 23-554

Content Guru Inc.
900 E. Hamilton Avenue, Suite 510
Campbell, CA 95008
ComplianceManager@redwoodtech.com

John Kabealo
Kabealo PLLC
1629 K Street, NW, Suite 300
Washington, DC 20006
ComplianceManager@redwoodtech.com

Via Certified First-Class Mail – Return Receipt Requested and E-mail

Re: Response Required – Potential Dismissal of International Section 214 Application Filed by Content Guru Inc., File No. ITC-214-20220714-00082

Dear Mr. Kabealo:

On June 14, 2022, Content Guru Inc. (Content Guru) filed the above referenced application with the Federal Communications Commission (Commission) to obtain an international section 214 authorization.¹ On August 29, 2022, the Committee for the Assessment of Foreign Participation in the United States Telecommunications Service Sector (Committee) notified the Commission that it was reviewing Content Guru's application for any national security or law enforcement concerns.²

On June 7, 2023, the Committee returned the application to the Commission, recommending the application be dismissed without prejudice.³ The Committee states that Content Guru has failed to respond to a request for information. According to the Committee, it granted Content Guru three extensions to provide the information and warned Content Guru that no further extension would be granted if Content Guru failed to meet its last deadline of June 6, 2023.⁴ The Committee states that the

¹ Application of Content Guru Inc. for International Section 214 Authorization, File No. ITC-214-20220714-00082 (filed June 14, 2022).

² *Non Streamlined International Applications/Petitions Accepted for Filing*, Public Notice, Report No. TEL-02213NS at 1 (IB Sept. 1, 2022).

³ See Letter from Christine M. Quinn, Attorney Advisor, Foreign Investment Review Section, National Security Division, U.S. Department of Justice, to Marlene H. Dortch, Federal Communications Commission at 1 (June 7, 2023) (on file in ITC-214-20220714-00082) (June 7, 2023 DoJ Letter).

⁴ *Id* at n.1. The Committee notified the Commission of these three extensions of the 120-day period by letters dated May 9, 2023, May 24, 2023, and May 31, 2023. See Letter from Christine M. Quinn, Attorney Advisor, Foreign Investment Review Section, National Security Division U.S. Department of Justice, to Marlene H. Dortch, Federal Communications Commission at 1 (May 9, 2023) (on file at ITC-214-20220714-00082) (May 9, 2023 DoJ Letter); Letter from Christine M. Quinn, Attorney Advisor, Foreign Investment Review Section, National Security Division,

applicant missed the June 6, 2023, deadline.⁵ According to the Committee, it cannot complete its review of the application and has returned the application to the Commission with a recommendation it be dismissed without prejudice.⁶

The Committee's recommendation regarding the national security and law enforcement concerns with an application with foreign ownership is an important consideration in the Commission's determination of whether the grant of an application is in the public interest.⁷ If the Committee is unable to make a recommendation because the applicant does not provide the required information to the Committee, the Commission will not have the information it needs to find that the grant of the application is in the public interest.

Content Guru must respond to this letter by **July 28, 2023**. In your letter, state whether you intend to pursue the application and if so, indicate when you will provide the Committee with the information it has requested. If you do not respond to this letter, the above referenced application will be dismissed without prejudice pursuant to the Commission's rules.⁸

Should you need further assistance, please contact Svantje Swider at (202) 418-0772 or svantje.swider@fcc.gov.

Sincerely,

/s/Francis Gutierrez
Francis Gutierrez, Deputy Chief
Telecommunications & Analysis Division
Office of International Affairs

Enclosures: June 7, 2023 DoJ Letter
May 31, 2023 DoJ Letter
May 24, 2023 DoJ Letter
May 9, 2023 DoJ Letter

U.S. Department of Justice, to Marlene H. Dortch, Federal Communications Commission at 1 (May 24, 2023) (on file at ITC-214-20220714-00082) (May 24, 2023 DoJ Letter); Letter from Christine M. Quinn, Attorney Advisor, Foreign Investment Review Section, National Security Division, U.S. Department of Justice, to Marlene H. Dortch, Federal Communications Commission at 1 (May 31, 2023) (on file at ITC-214-20220714-00082) (May 31, 2023 DoJ Letter).

⁵ June 7, 2023 DoJ Letter at 1.

⁶ *Id.*

⁷ See *Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership*, IB Docket 16-155, Report and Order, 35 FCC Rcd 10927 (2020).

⁸ 47 CFR §§ 1.748(a) and 1.10014(b). Any filing must be filed in ICFS using the [ICFS Pleadings and Comments module](#).

Enclosures

cc: FCC-TTelecom@fcc.gov
David Krech (via e-mail at David.Krech@fcc.gov)
Adrienne McNeil (via e-mail at Adrienne.McNeil@fcc.gov)
Applications.TT@usdoj.gov
osd.pentagon.ousd-a-s.list.team-telecom@mail.mil
dhsteamtelecom@hq.dhs.gov



U.S. Department of Justice

National Security Division

Foreign Investment Review Section

Washington, D.C. 20530

Content Guru Inc.; ITC-214-20220714-00082 (TT 22-042)

Pursuant to Executive Order 13913 (Apr. 4, 2020), the Chair of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector ("Committee") is making a notification that the Committee recommends that the above-referenced application be dismissed without prejudice.

Devin A. DeBacker
Chief
Foreign Investment Review Section
National Security Division
U.S. Department of Justice



U.S. Department of Justice

National Security Division

Foreign Investment Review Section

Washington, D.C. 20530

Content Guru Inc.; ITC-214-20220714-00082 (TT 22-042)

Pursuant to Executive Order 13913 (Apr. 4, 2020), the Chair of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector ("Committee") is making a notification that the Committee has granted a request by the applicant(s) in the above-referenced application for an extension of time to submit responses to the Committee's questions.

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DEBACKER
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Devin A. DeBacker
Chief
Foreign Investment Review Section
National Security Division
U.S. Department of Justice



U.S. Department of Justice

National Security Division

Foreign Investment Review Section

Washington, D.C. 20530

May 24, 2023

By E-File

Ms. Marlene H. Dortch
Federal Communications Commission
45 L St. N.E.
Washington, D.C. 20554

Re: Content Guru Inc.; ITC-214-20220714-00082 (TT 22-042)

Dear Ms. Dortch:

The Commission is notified that the applicant for the above-referenced application has requested and received an extension of time to provide complete responses to questions posed by the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector.¹ The 120-day review period now ends on July 17, 2023.

Thank you for your consideration.

Sincerely,

_____/s/
Christine M. Quinn
Attorney Advisor
Foreign Investment Review Section
National Security Division
U.S. Department of Justice

cc: FCC-TTelecom@fcc.gov
[David Krech \(via e-mail at david.krech@fcc.gov\)](mailto:David.Krech@fcc.gov)
[Adrienne McNeil \(via e-mail at Adrienne.McNeil@fcc.gov\)](mailto:Adrienne.McNeil@fcc.gov)
Applications.TT@usdoj.gov
IP-FCC@HQ.DHS.GOV
osd.pentagon.ousd-a-s.list.team-telecom@mail.mil

¹ See attached notification of the Chair.



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Devin A. DeBacker

Chief

Foreign Investment Review Section

National Security Division

U.S. Department of Justice



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Content Guru Inc.; ITC-214-20220714-00082 (TT 22-042)

Pursuant to Executive Order 13913 (Apr. 4, 2020), the Chair of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Committee”) is making a notification that the Committee has granted a request by the applicant(s) in the above-referenced application for an extension of time to submit responses to the Committee’s questions.

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Date: 2023.05.09
17:12:47 -04'00'

Devin A. DeBacker

Chief

Foreign Investment Review Section

National Security Division

U.S. Department of Justice